

BERRY SAHRADNIK KOTZAS & BENSON, P.C.

212 Hooper Avenue, P.O. Box 757

Toms River, NJ 08754-0757

Phone: (732) 349-4800

Fax: (732) 349-1983

Attorneys for Defendant Scott M. Colabella, in his official capacity as Ocean County Clerk

CHRISTINE CONFORTI,

Plaintiff

vs.

CHRISTINE GIORDANO HANLON, in her official capacity as Monmouth County Clerk, SCOTT M. COLABELLA, in his official capacity as Ocean County Clerk, and PAULA SOLLAMI COVELLO, in her official capacity as Mercer County Clerk,

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW
JERSEY

Civil Action No.: 3:20-cv-
08267-FLW-TJB

Civil Action

NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT
PURSUANT TO F.R.C.P. 12(b)(6)
& (b)(7)

MOTION DATE: JANUARY 4, 2021

TO: **Brett M. Pugach, Esq.**
Bromberg Law LLC
41 West 43rd Street, Suite 32
New York, NY 10036-7424

PLEASE TAKE NOTICE that on January 4, 2021 at 9:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, the undersigned will apply to the above named court for an Order dismissing Plaintiff's complaint.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely on the brief in support of this motion submitted simultaneously herewith.

A proposed form of order accompanies this motion.

PLEASE TAKE FURTHER NOTICE that if an opposition brief is filed thereto this party requests oral argument pursuant to L. Civ. R. 78.1(b).

RESPECTFULLY SUBMITTED,

BERRY SAHRADNIK KOTZAS & BENSON

By: /s/ Christopher A. Khatami

DATED: December 7, 2020

CHRISTOPHER A. KHATAMI, ESQ.
(043472013)